

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

STANFORD L. BURRIS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No.: 04-1469
	)	
RICHARDS PAVING, INC.	)	
	)	
Defendant.	)	

**NOTICE OF 30(b)(6) DEPOSITION IN AID OF EXECUTION**

TO: Matthew P. Donelson, Esquire  
Elzufon, Austin, Reardon,  
Tarlov & Mondell  
300 Delaware Avenue, Suite 1700  
P.O. Box 1630  
Wilmington, DE 19899

Pursuant to the provisions of Rule 30(b)(6), *Federal Rules of Civil Procedure*, the defendant is to produce a witness to testify and produce all documents relating to and pertaining to the matters attached hereto as Exhibit No. 1, for a deposition on Friday, February 9, 2007 at 10:00 a.m. in the offices of Aber, Goldlust, Baker & Over, 702 King Street, Suite 600, Wilmington, DE 19801.

ABER, GOLDLUST, BAKER & OVER

\_\_\_\_\_  
/s/ Gary W. Aber  
GARY W. ABER (DSB #754)  
702 King Street, Suite 600  
P.O. Box 1675  
Wilmington, DE 19899  
(302) 472-4900  
Attorney for Plaintiff

## **EXHIBIT 1**

1. All documents that refer, relate or pertain to any personal property which you have owned, purchased or sold during the last five years. Include all property, whether owned individually, jointly or otherwise.
2. All documents that refer, relate or pertain to any encumbrances, security interests, mortgages or any other type of lien or real or personal property owned by you, either individually, jointly or otherwise.
3. All documents that refer, relate or pertain to any item of your property that has been pledged to secure a debt.
4. All documents that refer, relate or pertain to any ownership interest in any business.  
Include, but do not limit the documents to those indicating proprietorship, stock ownership, partnership interest, and the present value of your interest.
5. All documents that refer, relate or pertain to any articles of incorporation, partnership, agreements, or certificates of doing business under a fictitious name filed with any governmental agency.
6. All documents that refer, relate or pertain to your ownership of any stocks, bonds, or other securities of any class in any government, governmental organization, company, firm or corporation, whether foreign or domestic.

7. All documents that refer, relate or pertain to any pledge agreement, mortgages or repurchase options held by anyone on any of the bonds, shares, stock certificates or other securities owned by you.
8. All documents that refer, relate or pertain to any business bank accounts held by you or a business in which you own an ownership interest. Include but do not limit the documents produced to the six most recent monthly statements for each account.
9. All documents that refer, relate or pertain to any joint savings or checking accounts maintained by you during the last five years. Include but do not limit the documents produced to the six most recent monthly statements.
10. All documents that refer, relate or pertain to any money you have had on deposit in either a checking account or savings account in any name other than the one currently used in identifying you as the defendant in this action.
11. All documents that refer, relate or pertain to any funds or accounts in any banks or institutions which are held in trust for your behalf.
12. All documents that refer, relate or pertain to any ownership interest you have had during the past 2 years in any choses in action.
13. All documents that refer, relate or pertain to any amounts in which you owe to any person, company, organization or other entity. Include but do not limit the documents to the most recent credit card statements and documents indicating current outstanding balances.
14. All documents that refer, relate or pertain to any compensation you have received from any source, including employment, earned interest, rental properties, barter arrangements, gambling winnings during the past 5 years. Include but do not limit the

documents produced to pay stubs and employment contracts.

15. All documents that refer, relate or pertain to any personal or real property owned by you that is currently or has been within the past 5 years, leased or rented to another person, company or entity of any kind. Include but do not limit the documents produced to the lease or rental agreements that have been entered for each item or unit and any balance sheets or income statements for each item or unit.
16. Your filed tax returns including all income earned in 2000 through 2006. Also include documents pertaining to the payment of estimated taxes paid or to be paid in 1999.
17. All documents that refer, relate or pertain to any gains earned as a result of the sale or trade of any property (real or personal) during any of the last five years.
18. All balance sheets, income statements, income tax returns, corporate minutes, stock records, buy or sell agreements, partnership or joint venture agreements and books and records kept in the usual course of business for you personally and for all business entities in which you have or had an interest or were employed within the past 5 years.
19. All documents that refer, relate or pertain to any judgments that have been entered in your favor in any action within the past 5 years.
20. All documents that refer, relate or pertain to any judgments that have been assigned to you.
21. All documents that refer, relate or pertain to any court action in which you are a party that is now pending in any court.
22. All documents that refer, relate or pertain to any personal property, real property or trade fixtures not heretofore covered in these request for documents in which you have any interest.

23. All documents that refer, relate to, mention or confirm your ownership interest in any company or partnership.
24. All documents that refer, relate to, mention or confirm your interest in any automobiles or trucks.
25. All documents that refer, relate to, mention or confirm your interest in any lawsuit.
26. All documents that refer, relate to, mention or confirm your interest in any trust.
27. All documents that refer, relate to, mention, or describe any debts or monies owned to you by any individual, corporation, company, and/or business entity.

**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that two copies of the attached pleading were hand delivered and sent via electronic filing on January 16, 2007 to the following counsel:

Matthew P. Donelson, Esquire  
Elzufon, Austin, Reardon,  
Tarlov & Mondell  
300 Delaware Avenue, Suite 1700  
P.O. Box 1630  
Wilmington, DE 19899

/s/ Melissa A. Chionchio  
Melissa A. Chionchio  
Secretary to Gary W. Aber, Esquire